

## **Exhibit E**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	) Chapter 11
TRONOX INCORPORATED, et al.,	)
Debtors.	) No. 09-10156 (ALG)
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TRONOX INCORPORATED, TRONOX	)
WORLDWIDE LLC f/k/a Kerr-McGee	) Adversary Proceeding
Chemical Worldwide LLC, and TRONOX	) No. 09-01198 (ALG)
LLC f/k/a Kerr-McGee Chemical LLC,	)
Plaintiffs,	)
v.	)
ANADARKO PETROLEUM CORPORATION	)
and KERR-MCGEE CORPORATION,	)
Defendants	)
-----	)
THE UNITED STATES OF AMERICA,	)
Plaintiff-Intervenor,	)
v.	)
TRONOX, INC., TRONOX WORLDWIDE LLC,	)
TRONOX LLC, KERR-MCGEE CORPORATION,	)
ANADARKO PETROLEUM CORPORATION,	)
Defendants.	)
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VIDEO DEPOSITION OF PERRY H. CHARLEY

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1 10:51:20 way down, does it state that the lessee hereby agrees  
2 10:51:23 "...promptly to surrender and return the premises upon the  
3 10:51:28 termination of this lease to whomsoever shall be lawfully  
4 10:51:33 entitled thereto, in as good condition as received, excepting  
5 10:51:37 for the ordinary wear and tear and unavoidable accidents in  
6 10:51:41 their proper use"?  
7 10:51:43 A Yes, sir.  
8 10:51:43 Q Okay. After the mining activities ceased on the  
9 10:51:56 Kerr-McGee mines, were they returned in as good condition as  
10 10:52:02 received?  
11 10:52:05 A No, sir, not according to our inventory.  
12 10:52:09 Q And based on your inventory, can you describe  
13 10:52:12 generally how the Kerr-McGee mines were left after mining  
14 10:52:15 ceased?  
15 10:52:16 A The workings were still -- the underground workings  
16 10:52:19 were still open. Vertical shafts were never covered up. There  
17 10:52:26 were piles and tons of radioactive waste, protore, and in some  
18 10:52:32 cases even ore, still left on site. There were pieces of old  
19 10:52:35 mining equipment -- equipment.  
20 10:52:40 In -- in many of the cases, there were man-made  
21 10:52:44 cliffs. It's referred to as high walls, that pose a lot of  
22 10:52:49 dangers to people who were unaware of those. A lot of  
23 10:52:54 radioactive wastes were dumped over cliff faces or left on  
24 10:52:59 site. We also found a lot of small drilled holes that were  
25 10:53:07 still loaded. You could see where blasting caps and dynamite